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USWEST

Andrew D. Crain
Senior Attorney

EX PARTE

July 22, 1999

RECEIVED
JUL 22 1999
FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Ms. Magalie Roman Salas, Secretary
Federal Communications Commission
The Portals
Room TW-A325
445 Twelfth Street, S.W.
Washington, D.C. 20554

RE: CC Docket No. 98-121

Dear Ms. Salas:

On July 14, 1999, Jeff Owens, Lori Simpson and I, of U S WEST, met with Michelle Carey, Jessica Rosenworcel, Anthony Mastando and David Kirschner of the Common Carrier Bureau staff to discuss U S WEST's policies, procedures and performance regarding resale, white page directory listings, operator services and directory assistance services. Copies of the materials discussed in the meeting are attached.

In accordance with Section 1.1206(b)(2) of the Commission's rules, an original and one copy of this letter and the attachments are being filed with your office for inclusion in the record of this proceeding. Copies of this ex parte are also being served on the above-identified Commission staff.

Sincerely,

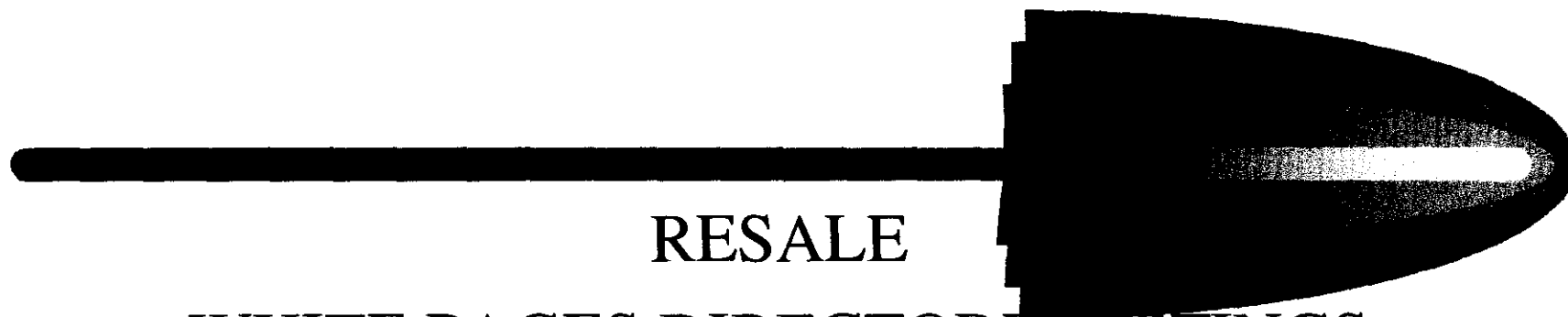


Andrew D. Crain

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U S WEST



RESALE

WHITE PAGES DIRECTORY LISTINGS

OPERATOR SERVICES

DIRECTORY ASSISTANCE SERVICE

RESALE



U S WEST provides retail telecommunications services for resale in a nondiscriminatory manner, at wholesale discounts, under its interconnection agreements and its Arizona Statement of Generally Available Terms and Conditions for Interconnection (SGAT)

Nebraska Commission determined U S WEST meets the 271 checklist requirements for resale

July 14, 1999

RESALE



U S WEST provides its retail telecommunications services for resale, including services in the following categories:

- Basic Exchange Telecommunications Services

- Basic Exchange Features

- IntraLATA Toll

July 14, 1999

RESALE



Contract Service Arrangements are
available for resale

CLECs may aggregate end users to qualify for a CSA
where those end users are similarly situated to
U S WEST's end users eligible for the same CSA

July 14, 1999

RESALE



U S WEST provides its retail telecommunications services for resale in a nondiscriminatory manner

Nondiscriminatory as between itself and CLECs

Nondiscriminatory as between CLECs

July 14, 1999

RESALE



U S WEST measures its performance performance indicators for resale

Installation Commitments Met

Installation Interval

Installation Trouble Reports (w/in 30
days of new installation)

Delayed Days

Out-of-Service Cleared w/in 24 Hours
(nondesignated repair)

All Troubles Cleared w/in 48 Hours
(nondesignated repair)

Out-of-Service Cleared w/in 4 Hours
(nondesignated repair)

Mean Time to Restore

Repair Repeated Report Rate

Trouble Rate

CLEC or CLEC's Customer-Caused Install
Misses

Delayed Orders Completed More Than 15
Days Past Commitment Date

Delayed Orders Completed More Than 90
Days Past Commitment Date

CLEC or CLEC's Customer-Caused Trouble
Reports

July 14, 1999

RESALE



Restrictions on resale are considered in the
Telecom Act of 1996 and FCC orders

Restrictions are approved or ordered by state
Commissions

General categories of restrictions include:

- Promotional offerings of 90 days or less are not available for
resale

- Cross-class restrictions

July 14, 1999

RESALE



U S WEST provides its retail telecommunications services for resale at wholesale discounts

All discounts have been approved or ordered by state Commissions

Discounts reflect costs avoided by U S WEST in providing retail services on a wholesale resale basis

July 14, 1999

RESALE



U S WEST provides support to
assist them in doing business with
U S WEST

U S WEST provides:

Training classes on products and services and on ordering
processes

Training documents for CLECs

“Interconnect and Resale Resource Guide” (IRRG) on the
Internet contains product and service descriptions and
extensive additional information

July 14, 1999

RESALE



U S WEST provides support to
assist them in doing business with

U S WEST (continued)

U S WEST provides:

Dedicated Account Managers for each CLEC to act as
single point of contact

Hotlines for assistance with use of Interconnection Mediated
Access (IMA) and product and service questions

July 14, 1999

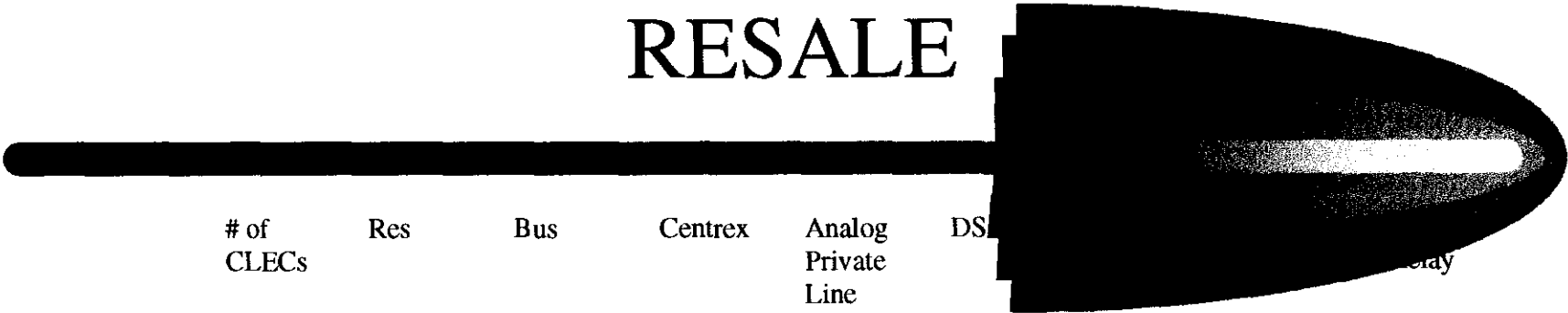
RESALE

Quantities of resold services in U S

	# of CLECs	Res	Bus	Centrex	Analog Private Line	DS0	DS1	DS3	Frame Relay
14 States	Approx. 50	40,668	85,497	158,238	4,917	118	636	1	12
AZ	30	10,042	4,042	-	10	-	128	1	-
NE	7	2,019	3,036	26	357	8	6	-	-
CO	16	5,657	8,877	24,760	286	-	126	1	-
IA	8	643	2,289	73,814	478	16	41	-	1
ID	4	97	129	-	-	-	18	-	-

July 14, 1999

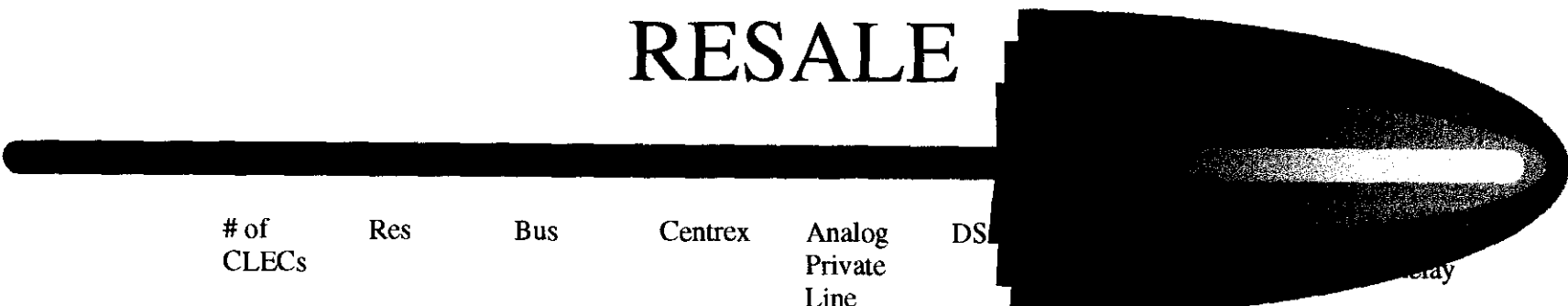
RESALE



	# of CLECs	Res	Bus	Centrex	Analog Private Line	DSL	Other	Delay
MN	17	12,127	42,905	47,607	2,524	53	212	- 2
MT	6	1,141	1,305	-	10	-	22	- -
ND	5	468	3,625	605	390	4	8	- 1
NM	3	2	98	-	1	-	2	- -
OR	12	3,284	3,254	3,863	165	1	11	- -
SD	4	1,653	9,404	-	450	35	18	- 1

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RESALE



	# of CLECs	Res	Bus	Centrex	Analog Private Line	DSL	Other	Relay
UT	6	905	529	-	8	-	9	-
WA	19	2,133	4,407	7,562	151	1	34	7
WY	3	497	1,597	1	87	-	1	-

July 14, 1999

WHITE PAGES DIRECTORY LISTINGS



U S WEST provides CLECs with directory listings that are nondiscriminatory in appearance and integration, and that are accurately and reliably provisioned, under its interconnection agreements and its Arizona SGAT

Nebraska Commission determined U S WEST meets the 271 checklist requirements for white pages directory listings

July 14, 1999

WHITE PAGES DIRECTORY LISTINGS



U S WEST provides white page directory listings to CLECs

Primary listings are provided at no charge to CLECs

Primary and premium listings are published in the white pages of the local telephone directory

Privacy listings include nonpublished and nonlisted listings

These are the same listings options available to U S WEST's retail end users

July 14, 1999

WHITE PAGES DIRECTORY LISTINGS



U S WEST provides listings that are
nondiscriminatory in appearance and
integration

CLECs' listings are indistinguishable from

U S WEST's listings in the white pages directories

CLECs' listings are provided in the same font and size
as U S WEST listings

CLECs' listings are not separately identified or
classified in white pages directories

July 14, 1999

WHITE PAGES DIRECTORY LISTINGS



U S WEST provides listings that are
accurately and reliably provisioned in a
nondiscriminatory manner

U S WEST provides listings to CLECs that are as
accurate and reliable as those provided to
U S WEST's retail end users

U S WEST's procedures for CLECs' and
U S WEST's retail listings treat all listings the same,
ensuring the same level of accuracy and reliability

July 14, 1999

WHITE PAGES DIRECTORY LISTINGS



Listings procedures include the following:

- U S WEST provides extensive listings training and documents to CLECs

- The same U S WEST personnel and systems process U S WEST and CLEC listings

- Manual and mechanical system edits are applied to all listings to ensure accuracy

- CLEC and U S WEST listings are commingled in U S WEST's listings database

- U S WEST provides CLECs with monthly "verification proofs" and on-demand reports, of their listings

- U S WEST provides CLECs with directory closing schedules

July 14, 1999

WHITE PAGES DIRECTORY LISTINGS



Listings procedures include the following:

- U S WEST submits a single daily file containing commingled CLEC and U S WEST listings to its official directory publisher, U S WEST DEX

- DEX publishes all listings received from U S WEST under the terms and conditions of the agreement between U S WEST and DEX

- U S WEST provides for delivery of directories to CLEC end users on the same terms and conditions as directories are delivered to U S WEST end users

July 14, 1999

WHITE PAGES DIRECTORY LISTINGS



Quantities of White Pages Directory Listings
Provided to CLECs (facility-based and
resellers) by U S WEST:

14 States:	>206,000 listings
Arizona:	> 27,000 listings
Nebraska:	> 14,500 listings

July 14, 1999

OPERATOR SERVICES



U S WEST provides CLECs with
nondiscriminatory access to its operator
services under its interconnection
agreements and its Arizona SGAT

Nebraska Commission determined U S WEST
meets the 271 checklist requirements for
access to operator services

July 14, 1999

OPERATOR SERVICES



U S WEST's and CLECs' end

U S WEST's operator services to complete local and intraLATA long distance calls, including person-to-person, collect, third party billing calls, calls to verify or interrupt busy line, emergency assistance, and quotation of charges

July 14, 1999

OPERATOR SERVICES



Reseller CLECs' end users access operator services over the same trunks carrying U S WEST's retail traffic

Resellers' end users dial the same number to access operator services as U S WEST's end users

Facility-based CLECs' end users access U S WEST's operator services over dedicated trunks provided by the CLEC

CLECs' end users dial a number selected by the CLEC to access operator services - may be same number as used by U S WEST's end users

July 14, 1999

OPERATOR SERVICES



Reseller CLECs can brand their end users' calls to U S WEST's operator services by using customized routing and dedicated transport, where technically feasible

Facility-based CLECs can brand their end users' calls to U S WEST's operator services by arranging for a branding message with U S WEST, where technically feasible

July 14, 1999

OPERATOR SERVICES



U S WEST has two measurements to access to operator services for all end users accessing the services

“Speed of Answer - Operator Services” measures the average time following the first ring before an operator answers a call

“Calls Answered Within Ten Seconds” measures the percentage of operator assisted calls that operators answer within ten seconds of the first ring

July 14, 1999

OPERATOR SERVICES



Disaggregation of operator services and performance results is not feasible and is not necessary given the structure of U S WEST's operator services platform and procedures

CLECs' and U S WEST's end users receive identical operator services

July 14, 1999

OPERATOR SERVICE



Calls feed to an available operator on a first-come, first-served basis

Resellers' end users' calls to operator services are commingled with U S WEST's end users' calls on shared trunks; the majority of CLEC calls are from resellers' end users

All calls, including facility-based CLECs' calls delivered over dedicated trunks, and reseller CLECs' calls and U S WEST's retail end users' calls delivered over shared trunks, are placed on a first-come, first-served basis, into a single queue for delivery to operators on a first-come, first-served basis

July 14, 1999

OPERATOR SERVICE



It is not feasible to provide separate measurements as the platform is structured; separate measurements would require separate trunks and separate queues for each CLEC, and deployment of additional software and personnel

Because U S WEST's platform structure and procedures afford U S WEST no opportunity to discriminate between callers, there is no need for separate measurements

July 14, 1999

OPERATOR SERVICES



Operator services are provided to
CLECs by U S WEST over the following
number of resold lines:

14 States:	>284,000
Arizona:	>14,000
Nebraska:	>5,000

July 14, 1999

OPERATOR SERVICES



Additionally, operator services are provided to end users of facility-based CLECs by U S WEST:

14 States:	24 CLECs
Arizona:	10 CLECs
Nebraska:	3 CLECs

July 14, 1999

DIRECTORY ASSISTANCE SERVICE



U S WEST provides CLECs with
nondiscriminatory access to its directory
assistance service under its interconnection
agreements and its Arizona SGAT

Nebraska Commission determined U S WEST
meets the 271 checklist requirements for
access to directory assistance service

July 14, 1999

DIRECTORY ASSISTANCE SERVICE



U S WEST's and CLECs' end

U S WEST's directory assistance to get the telephone number of any telephone subscriber contained in the directory assistance database, regardless of the telephone subscriber's local service provider

July 14, 1999

DIRECTORY ASSISTANCE SERVICE



CLECs enjoy the same options
appearance of their end users' listings on
directory assistance as U S WEST's end
users

Options for listings include primary, premium, and
privacy listings

July 14, 1999

DIRECTORY ASSISTANCE SERVICE



U S WEST provides CLECs with listings
in its directory assistance database

CLECs can purchase directory assistance listings in an electronic format, on magnetic tape, or by other medium as may be negotiated with the CLEC

CLECs can access the directory assistance database on a “per-dip,” real-time, read-only basis, using their own operators, just as U S WEST’s operator’s do

Listings provided in either manner include all listings in the directory assistance database, including those of independent companies and other CLECs

July 14, 1999

DIRECTORY ASSISTANCE SERVICE



Reseller CLECs' end users access
assistance service over the same trunks that carry
U S WEST's retail traffic

Resellers' end users dial the same number to access directory
assistance service as U S WEST's end users

Facility-based CLECs' end users access
U S WEST's directory assistance service over
dedicated trunks provided by the CLEC

CLECs' end users dial a number selected by the CLEC to access
directory assistance service - may be same number as used by
U S WEST's end users

July 14, 1999

DIRECTORY ASSISTANCE SERVICE



Reseller CLECs can brand their end users' calls to directory assistance service by using customized routing and dedicated transport, where technically feasible

Facility-based CLECs can brand their end users' calls to directory assistance service by arranging for a branding message with U S WEST, where technically feasible

July 14, 1999

DIRECTORY ASSISTANCE SERVICE



U S WEST has two measurements
directory assistance service for all end users
accessing the services

“Speed of Answer - directory assistance service”
measures the average time following the first ring
before the directory assistance system answers a call

“Calls Answered Within Ten Seconds” measures the
percentage of directory assistance calls that the
directory assistance system answers within ten
seconds of the first ring

July 14, 1999

DIRECTORY ASSISTANCE SERVICE




Disaggregation of directory assistance service performance results is not feasible and is not necessary given the structure of U S WEST's directory assistance service platform and procedures

CLECs' and U S WEST's end users receive identical directory assistance service

July 14, 1999

DIRECTORY ASSISTANCE SERVICE



Calls feed to an available operator on a first-come, first-served basis

Resellers' end users' calls to directory assistance service are commingled with U S WEST's end users' calls on shared trunks; the majority of CLEC calls are from resellers' end users

All calls, including facility-based CLECs' calls delivered over dedicated trunks, and reseller CLECs' calls and U S WEST's retail end users' calls delivered over shared trunks, are placed on a first-come, first-served basis, into a single queue for delivery to operators on a first-come, first-served basis

July 14, 1999

DIRECTORY ASSISTANCE SERVICE



It is not feasible to provide separate measurements as the platform is structured; separate measurements would require separate trunks and separate queues for each CLEC, and deployment of additional software and personnel

Because U S WEST's platform structure and procedures afford U S WEST no opportunity to discriminate between callers, there is no need for separate measurements

July 14, 1999

DIRECTORY ASSISTANCE SERVICE



Directory assistance service is provided to
reseller CLECs by U S WEST over the
following number of resold lines:

14 States:	>284,000
Arizona:	>14,000
Nebraska:	>5,000

July 14, 1999

DIRECTORY ASSISTANCE SERVICE



Additionally, directory assistance is provided to end users of facility-based CLECs by U S WEST:

14 States:	33 CLECs
Arizona:	7 CLECs
Nebraska:	3 CLECs

July 14, 1999